

**COUNT 1 (ADEA)**

20. Plaintiff incorporates paragraphs 1 through 19 above as if set forth fully herein.

21. Defendant, by the above discriminatory and wrongful acts, has violated the ADEA.

22. Defendant's violation of the ADEA was willful and warrants the imposition of liquidated damages under the ADEA.

23. As a direct and proximate result of Defendant's violation of the ADEA, as set forth above, Plaintiff has in the past incurred, and may in the future incur, a loss of earnings, a loss or earning capacity, loss of benefits, attorneys' fees and costs.

**COUNT 2 (PHRA)**

24. Plaintiff incorporates paragraphs 1 through 19 above as if set forth fully herein.

25. Defendant, by the above discriminatory and wrongful acts, has violated the PHRA.

26. As a direct and proximate result of Defendant's violation of the PHRA, as set forth above, Plaintiff has in the past incurred, and may in the future incur, a loss of earnings, a loss of earning capacity, a loss of benefits, pain and suffering, upset, emotional anguish, loss of life's pleasures, attorney's fees and costs.

**RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendant:

- (a) Declaring Defendant's actions to be in violation of the ADEA and the PHRA;
- (b) Awarding Plaintiff reinstatement to an appropriate position with Defendant;
- (c) Awarding compensatory damages to Plaintiff to make Plaintiff whole for all lost earnings, past and future, which Plaintiff has suffered as a result of Defendant's improper and